



September 13, 2019

Delivered via email to Ruralbroadband@nebraska.gov

Mr. Ed Toner, Chair  
Nebraska Rural Broadband Task Force  
c/o Nebraska Information Technology Commission  
Office of the Chief Information Officer  
501 South 14<sup>th</sup> Street, 4<sup>th</sup> Floor  
P.O. Box 95045  
Lincoln, NE 68509-5045

Re: Great Plains Communications LLC Comments in response to Appendix 7 of Nebraska Rural Broadband Task Force Findings and Recommendations, Draft of August 12, 2019

Dear Mr. Toner:

Great Plains Communications LLC ("Great Plains") provides the following comments updating the record pertaining to Great Plains and its customers in Appendix 7 of the draft Nebraska Rural Broadband Task Force ("Task Force") Findings and Recommendations. Specifically, Great Plains wishes to update the Task Force on the number of rural households to which the company has deployed broadband of at least 25/3 Mbps. Appendix 7 states that 1,771 rural households in Great Plains "rural areas," as defined by the Task Force, had broadband availability at speeds of at least 25/3 Mbps.

Great Plains has made significant strides in its broadband deployment to rural customers across the more than 14,000 square miles that it serves, particularly since the inception of the Federal Communications Commission's ("FCC") Alternative Connect America Model ("A-CAM") program that was implemented in 2017 and extended by the FCC for an additional 10 years starting in 2019. During the first two years of the A-CAM program, 2017 and 2018, Great Plains has reported broadband availability at speeds of 25/3 Mbps and higher in the federal High Cost Universal Broadband portal to an additional 2,385 A-CAM-eligible rural locations in its service area. These are all rural customers in addition to those that the Task Force reports as of June 2017 in Appendix 7.

In addition, consistent with the deployment obligations established by the FCC in connection with the A-CAM program, Great Plains has also reported broadband availability in the first two years of the A-CAM program at speeds varying from at least 4/1 Mbps and at least 10/1 Mbps to almost 4,000 additional rural locations. Many of these additional locations are only partially funded under the A-CAM program, and that funding alone is insufficient to deploy speeds of at least 25/3 Mbps. Great Plains intends to increase its available broadband speeds to 25/3 Mbps and higher to these customers if increased future support from the Nebraska Universal Service Fund ("NUSF") High Cost Program becomes available.



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Great Plains also is pleased to inform the Task Force that it is currently undertaking numerous A-CAM construction projects across its service area in order to bring broadband availability at speeds exceeding 25/3 Mbps to hundreds of additional rural households. Those projects include rural areas in which Great Plains serves customers near the following communities: Callaway, Creighton, Elgin, Ewing, Gordon, Hay Springs, Imperial, Indianola, Ponca, Rushville, St. Edward, Scribner, Stapleton and Wisner. Great Plains is also currently building broadband facilities to rural households in the Herman area with NUSF broadband deployment support made available by the Nebraska Public Service Commission. Therefore, Great Plains' broadband deployment will continue to increase when these projects are completed, and Great Plains will be undertaking additional rural projects in 2020 and ensuing years.

We look forward to working with the Task Force to achieve broadband deployment to all rural Nebraskans.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd A. Foje". The signature is stylized with a large "T" and "F".

Todd A. Foje  
CEO, Great Plains Communications LLC

cc: Commissioner Mary Ridder  
Commissioner Rod Johnson  
Commissioner Crystal Rhoades  
Commissioner Tim Schram  
Commissioner Dan Watermeier  
Mike Hybl  
Shana Knutson  
Cullen Robbins